

LISA LYNNE RUSSELL
Deputy Assistant Attorney General,
Environment & Natural Resources Division
United States Department of Justice
MICHAEL S. SAWYER
Senior Attorney, Natural Resources Section
DANIEL C. LUECKE
Trial Attorney, Natural Resources Section
Ben Franklin Station, P.O. Box 7611
Washington, D.C. 20044-7611
(202) 514-5273 (Sawyer)
(202) 598-7863 (Luecke)
michael.sawyer@usdoj.gov
daniel.luecke@usdoj.gov

ERIC HEIMANN
United States Attorney
C. LEVI MARTIN (WY Bar #6-3781)
Civil Chief
P.O. Box 668
Cheyenne, WY 82003-0668
Telephone: 307-772-2124
christopher.martin@usdoj.gov

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

STATE OF WYOMING,

Petitioner,

v.

THE UNITED STATES DEPARTMENT OF
THE INTERIOR, *et al.*,

Respondents, and

CENTER FOR BIOLOGICAL DIVERSITY,
et al.,

Intervenor-Respondents.

No. 1:22-cv-00247-SWS (Lead Case)

WESTERN ENERGY ALLIANCE, *et al.*

Petitioners,

v.

DEB HAALAND, in her official capacity as
Secretary of the Interior, *et al.*,

Respondents, and

CENTER FOR BIOLOGICAL DIVERSITY,
et al.,

No. 1:22-cv-00252-SWS (Joined Case)

Intervenor-Respondents.

WESTERN ENERGY ALLIANCE, *et al.*

Petitioners,

v.

DEB HAALAND, in her official capacity as
Secretary of the Interior, *et al.*,

Respondents, and

CENTER FOR BIOLOGICAL DIVERSITY,
et al.,

Intervenor-Respondents.

No. 1:23-cv-00001-SWS (Joined Case)

UNOPPOSED MOTION TO EXTEND
REMEDY BRIEF DEADLINES

Respondents respectfully move to extend the deadline to file remedy briefs by thirty-one days to March 3 and March 17, 2025. Counsel for all Petitioners and Intervenor-Respondents state that their clients do not oppose this request provided that all remedy brief deadlines are extended. In support of this request, Respondents state as follows:

1. On December 31, 2024, the Court issued its Order Upholding in Part and Remanding in Part Agency Action on Judicial Review (Order), Dkt. 75. The Order calls for simultaneous remedy briefs to be filed by January 31 and February 14, 2025. Order 34.
2. On January 20, 2025, President Donald J. Trump was inaugurated. Incoming leadership at both the Departments of Justice and the Interior needs additional time to consider the issues raised by the Court's Order and respond to the Order's call for remedy briefing.

For the foregoing reasons, Respondents respectfully request that the Court extend remedy briefing deadlines from January 31 and February 14, 2025, to March 3 and 17, 2025.

Respectfully submitted this 27th day of January 2025.

LISA LYNNE RUSSELL
Deputy Assistant Attorney General
Environmental & Natural Resources Division
U.S. Department of Justice

/s/ Michael S. Sawyer
MICHAEL S. SAWYER
Senior Attorney, Natural Resources Section
DANIEL C. LUECKE
Trial Attorney, Natural Resources Section

ERIC HEIMANN
United States Attorney

/s/ C. Levi Martin
C. LEVI MARTIN
Civil Chief

Counsel for Respondents